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Attorneys for Defendants
FARMERS GROUP, INC., FARMERS INSURANCE
EXCHANGE, and TRUCK INSURANCE
EXCHANGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RONALD STALLONE, on behalf of himself
and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada
Corporation; FARMERS INSURANCE
EXCHANGE; and TRUCK INSURANCE
EXCHANGE,

Defendants.

Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

Defendants Farmers Group, Inc., Farmers Insurance Exchange, and Truck Insurance
Exchange (collectively, "Farmers") and Plaintiff Ronald Stallone ("Plaintiff") submit this
stipulation and proposed order to extend Farmers' deadline to file its motion to dismiss Plaintiff's

1 Complaint. This is the first request or stipulation to extend Farmers' deadline to respond to the
2 Complaint.

3 Plaintiff filed his Complaint on September 8, 2021, Farmers later waived service, and
4 Farmers' response to the Complaint is currently due on November 30, 2021. (*See* Waivers of
5 Service, ECF No. 12). The parties have been engaged in good-faith negotiations concerning the
6 proper defendants for Plaintiff to name in this action and the potential, voluntary dismissal of the
7 currently named Farmers entities. To allow these negotiations to conclude before Farmers must
8 respond to the Complaint, and to avoid unnecessary dismissal briefing on this issue, the parties
9 stipulate—in good faith, and not for purposes of delay—to extend the response deadline from
10 November 30, 2021 to January 7, 2022. This proposed schedule will (1) permit the parties time to
11 resolve this issue on their own and limit the number of issues the Court must adjudicate and (2)
12 avoid any party being under briefing deadlines over the winter holidays. Accordingly, there is
13 “good cause” to adjust the due date for Farmers' response.

14 For these reasons, the parties stipulate that Farmers' response to the Complaint shall be
15 due on or before **January 7, 2022**.

16 **IT IS SO STIPULATED.**

17 Dated this 23rd day of November 2021.

18 KIND LAW FIRM

LEWIS ROCA ROTHBERGER CHRISTIE LLP

19 By: /s/ Michael Kind

By: /s/ Brian D. Blakley

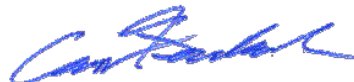
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25 IT IS SO ORDERED.

26 

27 Cam Ferenbach
28 United States Magistrate Judge

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DATED 11-24-2021